

EXHIBIT 11

Christopher Markos

From: Elizabeth L. Kramer <ekramer@laverylaw.com>
Sent: Wednesday, January 19, 2022 10:01 AM
To: Christopher Markos; rich@raiderslaw.com
Cc: Frank J. Lavery, Jr.; Mindy S. Kushner; Aimee Paukovits
Subject: Gerhart, et al. v. Energy Transfer Partners, L.P.--Following up Re: TigerSwan Designee Deposition

Good morning,

I am writing to follow-up on our discussion last week. We have been having difficulty feasibly locating the documents associated with the designee deposition for our client, TigerSwan. This is due to the extensive amounts of e-mails returned in our e-mail search efforts where we have been trying to locate documents associated with the topics outlined in the notice. We recently received the report back from the third party vendor pertaining to the most recent search we had run and over 580,000 pages of documents were returned. I am guessing that the majority of the documents in that batch may not be responsive or relevant, but for our office to sift through those documents is not reasonable. On top of these e-mail searches, we had already compiled hundreds if not thousands pages of additional documents to produce. Clearly, this type of document production is not feasible for a designee deposition in relation to our ability to prepare a witness and your ability to question the witness.

Accordingly, I propose that we postpone the designee deposition for TigerSwan and instead you serve our client with a limited set of requests for production of documents aimed at various topics that you may want to ask the designee about. I also propose that we agree to specific parameters for timeframe and search terms for any requests that will require us to run searches of the client's e-mail server. After you have received the responsive documents, I propose that we revisit your request for a designee deposition. With the documents we proposed, we should hopefully be able to agree upon a more specific and refined designee notice that will be feasible for both sides.

Please let me know if you would like to discuss this further or if you have any questions.

Thanks,

Elizabeth L. Kramer, Esquire

Lavery Law

225 Market Street, Suite 304

P.O. Box 1245

Harrisburg, PA 17108

Phone: 717.233.6633

Fax: 717.233.7003

Email: ekramer@laverylaw.com

Web: www.laverylaw.com



This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges; and is otherwise protected from disclosure under applicable law. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.